

BROWNSTEIN HYATT FARBER SCHRECK, P.C.  
Andrew S. Brignone, Nevada Bar No. 751  
Adam P. Segal, Nevada Bar No. 6120  
Michael V. Infuso, Nevada Bar No. 7388  
Nathan T.H. Lloyd, Esq., Nevada Bar No. 9106  
300 South Fourth Street, Ste. 1200  
Las Vegas, Nevada 89101  
Off: (702) 382-2101  
Fax: (702) 382-8135  
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TRUSTEES OF THE NEVADA  
RESORT ASSOCIATION –  
INTERNATIONAL ALLIANCE OF  
THEATRICAL STAGE EMPLOYEES  
AND MOVING PICTURE MACHINE  
OPERATORS OF THE UNITED  
STATES AND CANADA LOCAL 720  
PENSION TRUST; AND TRUSTEES  
OF THE NEVADA RESORT  
ASSOCIATION – INTERNATIONAL  
ALLIANCE OF THEATRICAL  
STAGE EMPLOYEES AND MOVING  
PICTURE MACHINE OPERATORS  
OF THE UNITED STATES AND  
CANADA LOCAL 720 WAGE  
DISABILITY TRUST,

Plaintiffs,

vs.

COPPER CREEK STUDIOS, INC., a  
Nevada corporation; and JOHN  
SALTONSTALL, II, an individual,

Defendants.

Case No.2:07-CV-00241-KLD-GWF

**STIPULATION TO ENTRY OF  
JUDGMENT**

BROWNSTEIN HYATT FARBER SCHRECK  
300 South Fourth Street, Suite 1200  
Las Vegas, Nevada 89101  
(702) 382-2101

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(702) 382-2101

1 Trustees of the Nevada Resort Association – International Alliance of Theatrical  
2 Stage Employees and Moving Picture Machine Operators of the United States and Canada  
3 Local 720 Pension Trust; and Trustees of the Nevada Resort Association – International  
4 Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the  
5 United States and Canada Local 720 Wage Disability Trust (collectively referred to as  
6 “IATSE Joint Trust Funds”), and Copper Creek Studios, Inc. a Nevada corporation and  
7 John Saltonstall, II, ("Saltonstall") (collectively referred to as “Copper Creek”) through  
8 their counsel and attorneys of record, hereby stipulate as follows:  
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10  
11 WHEREAS, the IATSE Joint Trust Funds' Motion to Entry of Judgment was filed  
12 on February 26, 2007;

13 WHEREAS, Copper Creek's Response to the Motion for Entry of Judgment was  
14 filed on March 16, 2007;

15  
16 WHEREAS, the IATSE Joint Trust Funds' Reply in Support of Motion for Entry of  
17 Judgment was filed on March 28, 2007;

18 WHEREAS, the IATSE Joint Trust Funds' Motion for Entry of Judgment is before  
19 this Court, the parties wish to resolve the Motion for Entry of Judgment by entering this  
20 Stipulation to Entry of Judgment;  
21

22 WHEREFORE, the IATSE Joint Trust Funds, Copper Creek and Saltonstall  
23 stipulate to judgment under 29 U.S.C. §1001 et seq. of the Employee Retirement Income  
24 Security Act of 1974 (“ERISA”) as follows:  
25

26 1. The stipulated judgment shall be in favor of IATSE Joint Trust Funds and  
27 against Copper Creek and Saltonstall in the total sum of Two Hundred Thirty Thousand  
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1 Seven Hundred Ninety Four and 76/100 Dollars (\$230,794.76), representing delinquent  
2 employee benefits, liquidated damages, interest, attorneys' fees and costs, and less  
3 payment received from Copper Creek.

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5 2. This Stipulation to Entry of Judgment is for a debt justly due to the IATSE  
6 Joint Trust Funds under ERISA and arising out of the following facts:

7 3. Copper Creek is signatory to and bound by the terms of the Labor  
8 Agreement and the Trust Agreements establishing the IATSE Joint Trust Funds.

9  
10 4. Under these Agreements, Copper Creek is obligated to pay employee  
11 benefits to the IATSE Joint Trust Funds on behalf of Copper Creek's bargaining unit  
12 employees represented by the International Alliance of Theatrical Stage Employees and  
13 Moving Picture Machine Operators of the United States and Canada Local 720 or its  
14 affiliated locals.

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16 5. Based on remittance reports that Copper Creek submitted for the months of  
17 December, 2003 through February, 2004, April, 2004 through August, 2005, and April,  
18 2006 through March, 2007, Copper Creek is delinquent in payment of employee benefits  
19 and resulting ancillary costs to the IATSE Joint Trust Funds.

20  
21 6. Copper Creek is delinquent to the IATSE Joint Trust Funds for employee  
22 benefits totaling Two Hundred Sixteen Thousand Eight Hundred Fifty Two and 37/100  
23 Dollars (\$216,852.37), liquidated damages of Forty Three Thousand Three Hundred  
24 Seventy and 47/100 Dollars (\$43,370.47), past interest at 18% in the amount of Forty Five  
25 Thousand Two Hundred Sixty One and 66/100 Dollars (\$45,261.66), past attorneys' fees  
26 and costs in the amount of Twelve Thousand Four Hundred Thirty Three and 90/100  
27  
28

1 Dollars (\$12,433.90), and less payments received from Copper Creek totaling Eighty  
2 Seven Thousand One Hundred Twenty Three and 64/100 Dollars (\$87,123.64) for a total  
3 of Two Hundred Thirty Thousand Seven Hundred Ninety Four and 76/100 Dollars  
4 (\$230,794.76).  
5

6 7. Saltonstall has guaranteed and agreed to be liable for Copper Creek's  
7 delinquencies to the IATSE Joint Trust Funds, totaling \$230,794.76.

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8. The foregoing is for a debt justly due and owing by Copper Creek and Saltonstall to the IATSE Joint Trust Funds under 29 U.S.C. §1001 et seq. "ERISA."

Dated: August 14, 2007.

Dated: August 14, 2007.

BROWNSTEIN HYATT FARBER  
SCHRECK, P.C.

CALLISTER & REYNOLDS

/s/ Michael V. Infuso

/s/ Matthew Q. Callister

Michael V. Infuso, Esq.  
Nevada Bar No. 7388  
300 South Fourth Street, Suite 1200  
Las Vegas, Nevada 89101

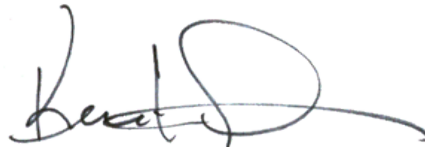
Matthew Q. Callister, Esq.  
Nevada Bar No. 1396  
Jonathan C. Callister, Esq.  
Nevada Bar No. 8011  
823 Las Vegas Boulevard South  
Las Vegas, Nevada 89101

Attorneys for Plaintiffs

Attorneys For Defendants

**ORDER**

**IT IS SO ORDERED.**



**United States District Judge / Magistrate**

**Date** AUGUST 15, 2007

**Case No. 2:07-CV-00241-KLD-GWF**